

1 MICHAEL A. JACOBS (CA SBN 111664)
2 MJacobs@mofo.com
3 ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
4 ERIC A. TATE (CA SBN 178719)
ETate@mofo.com
5 RUDY Y. KIM (CA SBN 199426)
RKKim@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
6 San Francisco, California 94105-2482
Telephone: 415.268.7000
7 Facsimile: 415.268.7522

8 Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
9 OTTOMOTTO LLC, and OTTO TRUCKING LLC

10 KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsflpp.com
11 HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsflpp.com
12 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
13 Washington DC 20005
Telephone: 202.237.2727
14 Facsimile: 202.237.6131

15 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

21 v. Plaintiff,

**DECLARATION OF ESTHER KIM
CHANG IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT OF
NON-INFRINGEMENT**

22 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Date: June 8, 2017
Time: 8:00 a.m.
Ctrm: 8, 19th Floor
Judge: The Honorable William Alsup

23 Defendants.

24 Trial Date: October 2, 2017

25

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants' Uber Technologies, Inc.,
6 Ottomotto LLC, and Otto Trucking LLC's Motion for Summary Judgment of Non-Infringement.

7 2. Attached hereto as Exhibit 1 is a true and correct copy of
8 U.S. Patent No. 8,836,922 B1, dated September 16, 2014.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of
10 U.S. Patent No. 9,285,464 B2, dated March 15, 2016.

11 4. Attached hereto as Exhibit 3 is a true and correct copy of
12 U.S. Patent No. 9,086,273 B1, dated July 21, 2015.

13 5. Attached hereto as Exhibit 4 are relevant pages from the deposition of Gregory
14 Kintz taken on April 26, 2017.

15 I declare under the penalty of perjury under the laws of the United States that the
16 foregoing is true and correct. Executed this 2nd day of May, 2017, in San Francisco, California.

17 _____
18 */s/ Esther Kim Chang*
ESTHER KIM CHANG

21 **ATTESTATION OF E-FILED SIGNATURE**

22 I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this
23 Declaration. In compliance with General Order 45, X.B., I hereby attest that Esther Kim Chang
24 has concurred in this filing.

25 Dated: May 2, 2017

26 _____
27 */s/ Michael A. Jacobs*
Michael A. Jacobs
28